

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

**WSOU INVESTMENTS, LLC D/B/A BRAZOS
LICENSING AND DEVELOPMENT,**

Plaintiff,

v.

**DELL TECHNOLOGIES INC., DELL INC.,
EMC CORPORATION, AND VMWARE, INC.**

Defendant.

CIVIL ACTION 6:20-cv-00473-ADA
CIVIL ACTION 6:20-cv-00475-ADA
CIVIL ACTION 6:20-cv-00476-ADA
CIVIL ACTION 6:20-cv-00477-ADA
CIVIL ACTION 6:20-cv-00480-ADA
CIVIL ACTION 6:20-cv-00481-ADA
CIVIL ACTION 6:20-cv-00482-ADA
CIVIL ACTION 6:20-cv-00485-ADA
CIVIL ACTION 6:20-cv-00486-ADA

**WSOU INVESTMENTS, LLC D/B/A BRAZOS
LICENSING AND DEVELOPMENT,**

Plaintiff,

v.

ZTE CORPORATION,

Defendant.

CIVIL ACTION 6:20-cv-00487-ADA
CIVIL ACTION 6:20-cv-00488-ADA
CIVIL ACTION 6:20-cv-00489-ADA
CIVIL ACTION 6:20-cv-00490-ADA
CIVIL ACTION 6:20-cv-00491-ADA
CIVIL ACTION 6:20-cv-00492-ADA
CIVIL ACTION 6:20-cv-00493-ADA
CIVIL ACTION 6:20-cv-00494-ADA
CIVIL ACTION 6:20-cv-00495-ADA
CIVIL ACTION 6:20-cv-00496-ADA
CIVIL ACTION 6:20-cv-00497-ADA

**WSOU INVESTMENTS, LLC D/B/A BRAZOS
LICENSING AND DEVELOPMENT,**

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

CIVIL ACTION 6:20-cv-00572-ADA
CIVIL ACTION 6:20-cv-00579-ADA
CIVIL ACTION 6:20-cv-00580-ADA
CIVIL ACTION 6:20-cv-00584-ADA
CIVIL ACTION 6:20-cv-00585-ADA

**WSOU INVESTMENTS, LLC D/B/A BRAZOS
LICENSING AND DEVELOPMENT,**

Plaintiff,

v.

**HEWLETT PACKARD ENTERPRISE
COMPANY,**

Defendant.

GOOGLE, LLC

Plaintiff,

v.

TERRIER SSC, LLC

Defendant.

GOOGLE, LLC

Petitioner,

v.

BP FUNDING TRUST

Respondent

GOOGLE, LLC

Petitioner,

v.

AQUA LICENSING, LLC

Respondent.

**CIVIL ACTION 6:20-cv-00725-ADA
CIVIL ACTION 6:20-cv-00726-ADA
CIVIL ACTION 6:20-cv-00728-ADA
CIVIL ACTION 6:20-cv-00730-ADA
CIVIL ACTION 6:20-cv-00783-ADA**

CIVIL ACTION 6:21-cv-01269-ADA

CIVIL ACTION 6:21-cv-01270-ADA

CIVIL ACTION 6:21-cv-01309-ADA

**DECLARATION OF JONATHAN K. WALDROP IN SUPPORT OF PLAINTIFF'S
RESPONSE TO JOINDER OF THE DELL DEFENDANTS TO GOOGLE'S MOTION
TO COMPEL RESPONSES TO SUBPOENA FROM BASEPOINT**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP. I am one of the attorneys responsible for the representation of Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development in this matter and make this declaration in support of Plaintiff's Case Readiness Status Report.

2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Court's November 2, 2021 Order Regarding Discovery Disputes in *WSOU Investments LLC v. Microsoft Corporation*, 6:20-cv-00454-ADA, Dkt. 104.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 18th day of March, 2022, in New York, New York.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop